

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JEANIE PEREZ MASANGCAY,

Plaintiff,

-v.-

OKSANA KAMENETSKAYA and
BAHRUZ BALAYEV,

Defendants.

1:18-cv-03666 (BMC)

NOTICE OF MOTION

Oral Argument Requested

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint, the Declaration of Bahruz Balayev, dated September 21, 2018, and the exhibits thereto, the Declaration of Oksana Kamenetskaya, dated September 21, 2018, and the exhibits thereto, and upon all pleadings filed in this action, Defendants Bahruz Balayev and Oksana Kamenetskaya, by their counsel McLaughlin & Stern, LLP, will move this Court before the Honorable Brian M. Cogan, United States District Judge, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, at a date and time to be determined by the Court, for an Order dismissing the Complaint of Plaintiff Jeanie Perez Masangcay pursuant to Federal Rules of Civil Procedure 12(b)(5) and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, pursuant to a prior Order of the Court, Plaintiff's answering papers, if any, must be filed on or before October 5, 2018, and Defendants reply papers shall be filed on or before October 12, 2018.

Dated: New York, New York
September 21, 2018

McLAUGHLIN & STERN, LLP

By: /s/ Jonathan R. Jeremias
Steven J. Hyman
Jonathan R. Jeremias
260 Madison Avenue
New York, New York 10016
T. (212) 448-1100
F. (212) 448-0066
shyman@mclaughlinstern.com
jjeremias@mclaughlinstern.com

*Attorneys for Defendants
Oksana Kamenetskaya and
Bahruz Balayev*

TO:

FRESHFIELDS BRUCKHAUS DERINGER US LLP
Weronika Bukowski
601 Lexington Avenue
31st Floor
New York, NY 10022
T. (212)277-4057
F. (212)277-4001
weronika.bukowski@freshfields.com

THE LEGAL AID SOCIETY
Heidi Lee Cain
199 Water Street
3rd Floor
New York, NY 10038
T. 212-577-3589
F. 646-616-9275
hlcain@legal-aid.org

*Attorneys for Plaintiff
Jeanie Perez Masangcay*